



REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
US ARMY CHEMICAL MATERIALS AGENCY  
TOOELE CHEMICAL AGENT DISPOSAL FACILITY  
11620 STARK ROAD  
STOCKTON, UTAH 84071

HAND DELIVERED

06.02477

JUL 20 2006

UTAH DIVISION OF  
SOLID & HAZARDOUS WASTE

July 17, 2006

Tooele Chemical Agent Disposal Facility

PM-60429

SUBJECT: Temporary Authorization (TA) Request – Modification of the Spent  
Decontamination Solution System (SDS) Tank Remote Sampling System (RSS)

Mr. Dennis Downs, Director  
Utah Department of Environmental Quality  
Division of Solid and Hazardous Waste  
288 North 1460 West  
Salt Lake City, Utah 84116-0690

Dear Mr. Downs:

TOCDF requests Temporary Authorization (TA), pursuant to 40 CFR 270.42(e), to begin construction, installation, testing and use of a modified SDS Tank Remote Sampling System (RSS) prior to the end of "60 days after the submission of the [Class 2 RCRA Modification] request" per §270.42(b)(8).

This request for TA is concurrent with the submittal of the Class 2 RCRA Permit Modification Request TOCDF-SDS-02-0899 "Spent Decon Tank Remote Sampling System", which will incorporate into the RCRA Permit revised as-built drawings. The RCRA Modification will not result in any Permit language changes since the Permit does not explicitly discuss the physical configuration of the SDS Tank Sampling System.

*§270.42(e)(2)(ii)(A), Activities to be Conducted Under the TA*

The existing SDS RSS will be modified such that a portion of the existing SDS-TANK-101 sample tubing is reconfigured in a manner that will serve all three SDS tanks. The existing sample tubing associated with SDS-TANK-102 and SDS-TANK-103 pump/piping/strainer loops will be abandoned in place; motive force for moving the spent decon to the sample glove box will be provided by the single existing agent spill transfer pump ACS-PUMP-120 instead of each tank's recirculation pump.

After installation and testing, but prior to the introduction of hazardous waste into the modified RSS, the SDS Hazardous Waste Management Unit (HWMU) will be recertified by an authorized independent Professional Engineer. The resulting Facility Construction Certification (FCC) will be submitted to the DSHW.

Upon DSHW approval of the SDS FCC, the modified RSS will be used for SDS sampling activities under authority granted by this TA until approval of the Class 2 permit modification.

*§270.42(e)(2)(ii)(B), Necessity of the TA*

The existing RSS is unreliable, resulting in the need for personnel to collect routine samples directly at the SDS tanks themselves. Since the SDS tanks are located in a contaminated Category A area of the Munitions Demilitarization Building (MDB), the sampling of the tanks results directly in elevated risk to personnel relative to sampling of the tanks from a remote location that is uncontaminated.

TOCDF is currently in the process of preparing for Mustard processing. As part of this "campaign changeover" extended shutdown, the MDB has been extensively decontaminated. Because of the very "clean" current condition of the MDB, many areas of the plant are uniquely accessible to plant personnel that are otherwise contaminated during agent processing. For this reason, every effort is being made to take advantage of the MDB cleanliness to perform necessary work in normally contaminated areas, prior to commencement of Mustard processing.

Because of the timeline associated with the approval and implementation of a RCRA Class 2 modification (e.g., public comment period, etc.), and the time associated with an FCC, a TA to commence construction, testing, and use of the modified SDS RSS is necessary.

*§270.42(e)(2)(ii)(C), Continued Compliance with 40 CFR Standards*

The modified SDS Tank RSS will operate essentially the same as the existing RSS, with the following notable exceptions:

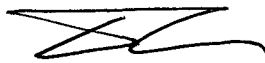
1. Instead of a separate sample supply and return line from *each* of the three SDS tanks to the Agent Sampling Room (ASR) glove box, there will be one single common supply and return line that is switchable to a given tank through the use of remote-operated valves.
2. The new sample line will tap directly off the discharge of the ACS-PUMP-120 which will be used for pre-sampling tank recirculation. The existing RSS draws its motive force by tapping off the discharge of each tank's specific recirculation pump (SDS-PUMP-291, 292, 293 for SDS-TANK-101, 102 and 103 respectively). The recirculation pumps/piping/strainer loops will be abandoned in place and all future tank pre-sampling recirculation will be performed by ACS-PUMP-120 exclusively.
3. ACS-PUMP-120 will be fitted with a flow meter to verify the adequate recirculation of SDS tank contents prior to drawing the sample. In the current

configuration, when used to recirculate tank contents, there is no direct indication of flow through ACS-PUMP-120.

*§270.42(e)(2)(ii)(E), Objective of the TA*

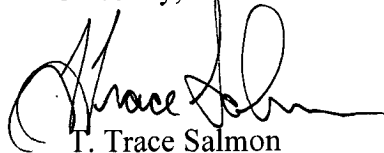
The objective of the TA is to further protect human health by enabling construction and testing to proceed in an area of the plant that is expected to be more contaminated at a later date (SDS Room), and to enable sampling to take place in a less contaminated area (ASR versus the SDS Room), after the commencement of Mustard processing.

If you have any questions regarding this issue, please contact Ms. Elizabeth A. Lowes at (435) 833-7832 or Mr. Trace Salmon at (435) 833-7428.



Timothy L. Olinger  
EG&G Defense Materials, Inc.  
\*CERTIFICATION STATEMENT

Sincerely,



T. Trace Salmon  
TOCDF Deputy Site Project Manager  
\*CERTIFICATION STATEMENT

Copies Furnished:

CMA Risk Management Directorate (Mr. Stang)  
DCD Risk Management Directorate (Mr. Levi)  
TOCDF FO Representative (Ms. Snow)  
File

\* I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.